

- - - - -X  
 UNITED STATES OF AMERICA :  
 :  
 - v. - :  
 :  
 Richard M. Valentine, Jr. :  
 :  
 Defendant. :  
 :  
 - - - - -X

STIPULATION IN SUPPORT  
 OF APPLICATION FOR 8<sup>TH</sup>  
 OR SUBSEQUENT ORDER OF  
 CONTINUANCE  
  
 18 MAG. 5453

13  
AJP

The United States of America and the defendant jointly request and agree that the time period from 2/13/2019 to 3/25/2019 be excluded from the computation of the period within which an information or indictment must be filed, pursuant to Title 18, United States Code, Section 3161(b) and (h) (7). The parties submit that there is good cause for an additional exclusion of time because:

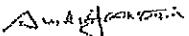
1. Christopher X. Maher., attorney for the defendant, has been engaging in discussions with the Government concerning a possible disposition of this case without trial, and those discussions are ongoing.

2. Specifically, the defendant, through counsel, submitted an application for deferred prosecution on November 15, 2018 that is still being considered by the Government. The application includes medical records and other documents that the Government is reviewing in connection with its decision on the application. While the Government expects its review to be completed soon, the Government requires additional time to review the application and to conduct any necessary meetings and/or calls with counsel for the defendant in connection with its review.

By the following signatures we agree and consent to the exclusion of time noted above:

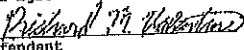
Defendants Counsel  
Christopher X. Maher, Esq.

Date

  
Andrew J. Derilippis  
Assistant United States Attorney

2/11/19  
Date

The defendant states that he/she has been fully advised by counsel of his/her rights guaranteed under (a) of the Sixth Amendment to the Constitution; (b) the Speedy Trial Act of 1974, as set forth in Title 18, United States Code, Sections 3161-74; and (c) the plans and rules of this Court adopted pursuant to that Act. The defendant understands that he/she has a right to be charged by indictment or information, and to have a trial before a judge or jury, within a specified time (excluding certain time periods) under the Constitution and Rules and Laws of the United States identified above. The defendant consents and agrees to the above request.

  
Defendant  
Richard M. Valentine, Jr.

2-11-19  
Date

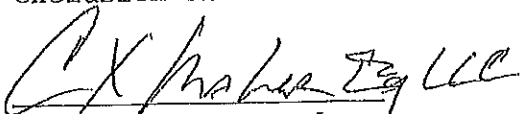
The joint application of the United States of America and the defendant having been heard at a proceeding on the date below, the time period from 2/13/19 to 2/13/19 is hereby excluded in computing the time within which an indictment or information must be filed. The Court grants this continuance on the finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial, for the reasons set forth above. The Court further orders:

Dated: 2/13/19  
White Plains, New York

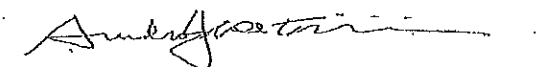
SO ORDERED

United States Magistrate Judge

By the following signatures we agree and consent to the exclusion of time noted above:

  
 Defendant's Counsel  
 Christopher X. Maher, Esq.

02/11/19  
 Date

  
 Andrew J. DeFilippis  
 Assistant United States Attorney

2/11/19  
 Date

The defendant states that he/she has been fully advised by counsel of his/her rights guaranteed under (a) of the Sixth Amendment to the Constitution; (b) the Speedy Trial Act of 1974, as set forth in Title 18, United States Code, Sections 3161-74; and (c) the plans and rules of this Court adopted pursuant to that Act. The defendant understands that he/she has a right to be charged by indictment or information, and to have a trial before a judge or jury, within a specified time (excluding certain time periods) under the Constitution and Rules and Laws of the United States identified above. The defendant consents and agrees to the above request.

Defendant.  
 Richard M. Valentine, Jr.

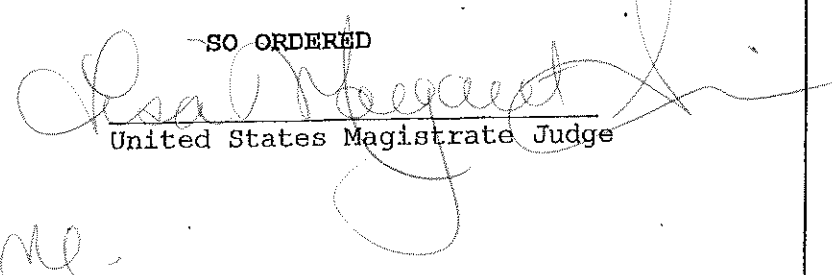
Date

2/13/19 3/13/19

The joint application of the United States of America and the defendant having been heard at a proceeding on the date below, the time period from ~~1/30/2019~~ to ~~2/15/2019~~ is hereby excluded in computing the time within which an indictment or information must be filed. The Court grants this continuance on the finding that the ends of justice outweigh the interests of the public and the defendant in a speedy trial, for the reasons set forth above. The Court further orders:

Dated: 2/13/2019  
 White Plains, New York

SO ORDERED

  
 United States Magistrate Judge

